UNITED STATES DISTRICT COURT

| SOUTHERN DISTRICT OF NEW YORK | |
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| BENJAMIN SCHWARZ, CHRISTINA SCHWARZ, And DANIEL SCHWARTZ, Plaintiffs, | X Docket No. 09-CV-9346 (PAE) : NOTICE OF MOTION : |
| V. | : : |
| THINKSTRATEGY CAPITAL MANAGEMENT LLC and CHETAN KAPUR, | : : : |
| Defendants. | : x |
| SECURITIES AND EXCHANGE COMMISSION: | |
| Plaintiff, v. | : : |
| CHETAN KAPUR and LILABOC, LLC | : |
| Defendants. | : |

PLEASE TAKE NOTICE that upon the annexed Declaration of Eric M. Creizman, Esq., dated July 7, 2015, the Defendant in the above-captioned actions, Chetan Kapur, will move before the Honorable Paul A. Englemayer, at the United States District Court, Southern District of New York, 40 Foley Square, Courtroom 1305, or at a date and time convenient to the Court, for an emergency stay of at least 30 days of the Court's order requiring Mr. Kapur to surrender to the United States Marshals Service and to remain incarcerated pending his purge of the contempt pursuant to the Court's Opinion and Order dated July 1, 2015, granting Plaintiffs' motion for contempt.

Dated: New York, New York July 7, 2015

By:/s/ Eric M. Creizman

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